



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 29, 2016

BY ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Ahmed Mohammed El Gammal, 15 Cr. 588 (ER)

Dear Judge Ramos:

The Government writes to update the Court as to the status of discovery in the above-captioned case. The Government has completed unclassified discovery. With respect to outstanding classified discovery, the Government has, with the assistance of the Classified Information Security Officer and other Court personnel, set up a dedicated computer terminal in the courthouse for defense counsel to review the materials. Because of an unforeseen server problem earlier today, the materials will not be accessible until Monday, May 2. The Government has advised defense counsel of the server problem. Once these materials become accessible, the Government will have completed classified discovery as well.

In addition, the Government requests that, prior to the next status conference in this case, the Court hold a pretrial conference, pursuant to Section 2 of the Classified Information Procedures Act, to consider matters relating to classified information that may arise in connection with this case.

Finally, the Government respectfully requests that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), between today and the new conference date, in order to allow the defendant and defense counsel to review discovery, and the parties to prepare for trial. A proposed order excluding time is attached for the Court's consideration.

Respectfully submitted,

PREET BHARARA
United States Attorney

By:

/s/

Brendan F. Quigley/Andrea L. Surratt/ Negar Tekeei
Assistant United States Attorneys
(212) 637-2190 / 2493 / 2482

- - - - -
UNITED STATES OF AMERICA : ORDER
-v.- : 15 Cr. 588 (ER)
AHMED MOHAMMED EL GAMMAL, :
Defendant. :
- - - - -

Upon the application of the United States of America, by
and through Preet Bharara, United States Attorney, Brendan F.
Quigley, Andrea L. Surratt, and Negar Tekeei, of counsel, it is
hereby ORDERED that the time from April 29, 2016, through
_____, is hereby excluded under the Speedy Trial
Act, 18 U.S.C. § 3161(h)(7)(A). The Court finds that the
granting of such an exclusion best serves the ends of justice
and outweighs the best interests of the public and the defendant
in a speedy trial because it will allow the defendant to review
the discovery in this case, and the parties to prepare for
trial.

SO ORDERED.

Dated: New York, New York
April ___, 2016

THE HONORABLE EDGARDO RAMOS
UNITED STATES DISTRICT JUDGE